

# EXHIBIT 67

**Confidential**



## **Transcript of Eda Daniel**

Saturday, April 9, 2022

***National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.***

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1 organizations have their own means of finding people.

2 Q. Whose we?

3 MR. GOLD: Objection.

4 A. American citizens, people who are educated,  
5 people who grew up here, people who watch TV, watch the  
6 news, just people, citizens.

7 Q. So American citizens would be able to tell that  
8 this particular statement is false; is that what you're  
9 saying?

10 MR. GOLD: Objection.

11 A. Once one thinks about it, one would know that  
12 it is false.

13 Q. Did you do any type of independent research  
14 online or otherwise to corroborate whether or not it was  
15 true or false?

16 A. No, I did not.

17 Q. And if persons can recognize that this  
18 statement is false, what about this statement makes it  
19 so pernicious?

20 MR. GOLD: Objection.

21 A. That a stranger is calling my house with false  
22 information.

23 Q. So it is pernicious because you received the  
24 call; is that correct?

25 A. Yes.

1 MR. KLEINMAN: You know what, so I'd  
2 like to share Exhibit A that was marked  
3 yesterday, Exhibit A which is a recording of  
4 the robo call for the record, so I'm going to  
5 do that now.

6 (Whereupon, the robo call recording was  
7 played as follows:

8 Hi, this is Tamika Taylor from Project  
9 1599 the civil rights organization founded by  
10 Jack Burkman and Jacob Wohl. Mail in voting  
11 sounds great. But did you know that if you  
12 vote by mail, your personal information will be  
13 part of a public database that will be used by  
14 police departments to track down old warrants  
15 and be used by credit card companies to collect  
16 outstanding debt? The CDC is even pushing to  
17 use records from mail in voting to track people  
18 for mandatory vaccines. Don't be finessed into  
19 giving your private information to the man.  
20 Stay safe and beware of vote by mail.)

21 Q. Is that the same robo call that you heard on  
22 August 26, 2020, Ms. Daniel?

23 A. Yes.

24 Q. Is there anything in particular about the tone  
25 and cadence of the speaker's voice that you feel was

1 A. I do not.

2 Q. Would it surprise you to learn that there were  
3 thousands of them?

4 A. It would not surprise me.

5 Q. Did you talk to every single one of those  
6 people to learn how they felt about the robo call?

7 A. No.

8 Q. Did you talk to them to learn about what affect  
9 it had on them?

10 A. I did not.

11 Q. What emotions did you feel, again, for the  
12 record when you received the robo call?

13 A. As I stated earlier, I initially felt fear. I  
14 then felt a sense of relief that this was not directed  
15 at me and then I felt anger realizing this was directed  
16 at people in my city.

17 Q. And you testified earlier during this  
18 deposition that this was an intrusion in your life,  
19 correct?

20 A. It was a very dark moment to get this call. It  
21 was startling and unpleasant enough that I felt I needed  
22 to do something.

23 Q. And would you characterize that as an  
24 intrusion?

25 A. Very much an intrusion.

## C E R T I F I C A T E

I, BROOKE E. PERRY, hereby certify that the Examination Before Trial of EDA DANIEL was held before me on the 9th day of April, 2022; that said witness was duly sworn before the commencement of her testimony; that the testimony was taken stenographically by myself and then transcribed by myself; that the party was represented by counsel as appears herein; That the within transcript is a true record of the Examination Before Trial of said witness;

That I am not connected by blood or marriage with any of the parties; that I am not interested directly or indirectly in the outcome of this matter; that I am not in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 9th day of April, 2022.

*Brooke E. Perry*

BROOKE E. PERRY